

III. REMARKS

Claims 1-20 are pending in this application. By this amendment, claims 1, 4, 10, 13, 15 and 18 have been amended. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Office, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the possibly allowable subject matter noted by the Office. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-2, 9-11, 14-16 and 18-20 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Okano *et al.* (U.S. Patent Pub. No. 2002/0062485 A1), hereafter “Okano,” in view of Aoyama *et al.* (U.S. Patent Pub. No. 2003/0199265 A1), hereafter “Aoyama.” Claims 3-7, 12-13 and 17 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Okano in view of Aoyama and further in view of Matsuda (U.S. Patent Pub. No. 2002/0133573 A1), hereafter “Matsuda,” and further in view of Poger (U.S. Patent No. 6,772,420 B1), hereafter “Poger.”

Applicants thank the Examiner for the telephone interview of September 14, 2007, with their representative, Hunter E. Webb. A proposed amendment was submitted in advance of the interview. In the interview, Applicants’ representative discussed features of the claimed invention that Applicants assert are not disclosed by the cited references, including those features included in the above claims as amended. In addition, the Examiner recommended various

amendments, such as those included in the amended claims, that the Examiner indicated might be useful in overcoming the cited references. No firm agreement was reached.

With regard to the 35 U.S.C. §103(a) rejection over Okano in view of Aoyama, Matsuda and/or Poger, Applicants assert that the cited references fail to teach or suggest each and every feature of the claimed invention. For example, with respect to newly amended independent claims 1, 10, 15 and 18, Applicants submit that the cited references fail to teach or suggest that the device identifier is unique from device identifiers of other devices of the server and not drawn from a pre-existing pool. In contrast, the references cited by the Office use DHCP (i.e., a protocol that uses a limited number of addresses for a large number of devices) and the addresses are drawn from a pre-existing pool. Furthermore, with respect to newly amended dependent claims 4 and 13, Applicants assert that the cited references also fail to teach or suggest that the correlation data includes a device type that is not the manufacturer and user data. Accordingly, Applicants respectfully request that the Office withdraw these rejections.

With respect to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all defendant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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